

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE**

JOHNNY M. HUNT,

Plaintiff,

vs.

**SOUTHERN BAPTIST CONVENTION,
et al.,**

Defendants.

)
)
)
)
)
)
)
)
)
)

3:23-cv-00243

DECLARATION OF ROY BLANKENSHIP

I, Roy Blankenship, do declare and state as follows:

1.

I am over the age of majority, am mentally competent, suffer from no legal disability, and make this Affidavit based on my personal knowledge.

2.

I am licensed in the state of Georgia as a Professional Counselor and as a Marriage and Family Therapist.

3.

In approximately 1996, I was ordained as a minister by First Baptist Church of Woodstock.

4.

I have a Master's Degree in Family and Marriage Therapy, awarded to me on April 13, 2010.

5.

EXHIBIT

1

In 2010, I was the Senior Counseling Pastor at First Baptist Church of Woodstock, working to develop the church's counseling division and leading an addiction recovery counseling ministry. In that role, a significant part of my ministry was to provide counseling services to pastors in crisis.

6.

In 2010, I was not a licensed counselor but understood that I was able to provide counseling services in my role at First Baptist Church of Woodstock under a statutory exception in O.C.G.A. § 43-10A-7(11).

7.

In the Fall of 2010, Johnny Hunt called upon me to provide marriage counseling to him and his wife, Janet Hunt.

8.

I conducted counseling sessions with Johnny Hunt, Janet Hunt, as well as the survivor/accuser whose allegations are at issue in this case and her husband. I counseled the couples separately and conducted at least one session with both couples.

9.

I conducted those counseling sessions in my capacity as Senior Counseling Pastor of First Baptist Church of Woodstock and conducted them in generally the same manner as I conducted any other counseling session.

10.

Those counseling sessions were at all times based on Biblical doctrine and conducted for the purpose of rehabilitating and fostering the disclosing parties' marriages to honor Biblical principles.

11.

It was my understanding then and is my understanding now that confidentiality and legal privileges apply to those communications to protect all disclosing parties, and I have made reasonable efforts to maintain confidentiality and privilege with respect to the disclosures made to me in those counseling sessions.

12.

For reasons wholly unrelated to the factual allegations made in this case, I resigned from First Baptist Church of Woodstock and returned my ordination certificate and ministry license to Johnny Hunt in 2019. I no longer have in my possession any such license or certificate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This 10th day of January, 2024.


ROY BLANKENSHIP